

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

LIANG WANG,

Plaintiff,

vs.

THE PHILHARMONIC SYMPHONY SOCIETY  
OF NEW YORK, INC. and ASSOCIATED  
MUSICIANS OF GREATER NEW YORK, LOCAL  
802, AMERICAN FEDERATION OF MUSICIANS,

Defendants.

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Case No.

1:24-cv-03356 (AS) (RWL)

[Rel: Case No. 1:24-cv-03348 (AS)  
(RWL)]

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**DECLARATION OF OLIVIA R. SINGER**

I, Olivia R. Singer, under penalty of perjury and in lieu of affidavit as permitted by 28 U.S.C. § 1746, declare as follows:

1. I am an attorney in the law firm Cohen, Weiss and Simon LLP, which serves as counsel to Defendant Associated Musicians of Greater New York, Local 802, American Federation of Musicians (“Local 802”) in this case. I make this declaration in support of Local 802’s motion to dismiss the Complaint pursuant to Federal Rule of Civil Procedure 12(b)(6).

2. Attached hereto as Exhibit A is a copy of the collective bargaining agreement between Local 802 and the Philharmonic-Symphony Society of New York, Inc. (the “Philharmonic”) with a term from September 21, 2020 to September 20, 2024. Compl. ¶1.

3. Attached hereto as Exhibit B is a copy of the April 12, 2024 *Vulture* article entitled “A Hidden Sexual-Assault Scandal at the New York Philharmonic.” Compl. ¶37.

4. Attached hereto as Exhibit C is a copy of the April 18, 2024 public

statement issued to the “New York Philharmonic Community” by the CEO of the Philharmonic. Compl. ¶¶49, 97, 130, 142.

5. Attached hereto as Exhibit D is a copy of the April 13, 2024 statement issued by the Orchestra Committee of the Philharmonic. Compl. ¶14.

6. Attached hereto as Exhibit E is a copy of the April 15, 2024 *New York Times* article concerning the *Vulture* piece and the Philharmonic’s investigation. Compl. ¶¶44–47.

7. Attached hereto as Exhibit F is a copy of the April 17, 2024 letter from Wang’s counsel to Local 802’s counsel. Compl. ¶63.

8. Attached hereto as Exhibit G is a copy of the April 18, 2024 letter from Local 802’s counsel to Wang’s counsel. Compl. ¶63.

9. Attached hereto as Exhibit H is a copy of the April 19, 2024 letter from Wang’s counsel to Local 802’s counsel. Compl. ¶63.

10. Attached hereto as Exhibit I is a copy of the April 26, 2024 letter from Local 802’s counsel to Wang’s counsel. Compl. ¶63.

11. Attached hereto as Exhibit J is a non-argumentative chart identifying the elements of Wang’s claims that were not plausibly alleged, as required by this Court’s Individual Rule 8.G.i.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed at New York, New York this 5<sup>th</sup> day of June 2024.

/s/ Olivia R. Singer  
Olivia R. Singer